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June 9, 2020

**Via ECF**

Hon. Steven L. Tiscione, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Chinchu v. Patel  
Case No.: 17-cv-06127-ILG-ST

Your Honor:

This firm represents the named Plaintiff Carlos Chinchu in the above-referenced action. We write in response to Defendant's motion to compel Plaintiff's deposition. [DE 67]. The motion should be denied for three reasons. First, defense counsel failed to meet and confer prior to making his motion. Second, we intend to move for reconsideration and clarification on Your Honor's Order, dated May 28, 2020, particularly about Defendants being allowed to re-depose Plaintiff and an issue concerning fees/costs. Third, the dates proposed by Defendants do not work for us.

Respectfully submitted,  
LAW OFFICES OF WILLIAM CAFARO

/s/  
Louis M. Leon (LL 2057)

To: All Counsel via ECF